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Attorney for  
ANTONIO TOLENTINO

UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No.:25-CR-00094 WBS
Plaintiff,	)	STIPULATION AND ORDER TO
	)	CONTINUE STATUS CONFERENCE
vs.	)	
ANTONIO TOLENTINO,	)	Date: FEBRUARY 23, 2026
LUCILA CALDERON	)	Time: 9:00 a.m.
	)	Judge: Hon. Shubb
Defendants.	)	

**STIPULATION**

The United States of America through its undersigned counsel, Caily Nelson Assistant United States Attorney, together with Attorney Dina Santos, counsel for Antonio Tolentino; and Attorney Timothy Warriner, counsel for Lucila Calderon hereby stipulate the following:

1. The Status Conference was previously set for December 15, 2025. By this stipulation, the parties now move to continue the Status Conference to February 23, 2026, at 9:00 a.m. and to exclude time between December 15, 2025, and February 23, 2026, under the Local Code T-4 (to allow defense counsel time to prepare).

- 1 2. The parties agree and stipulate, and request the Court find the following:
  - 2 a. A continuance is requested to continue to allow the Defense to meet with the
  - 3 Client, review recently produced discovery, conduct investigation, and discuss
  - 4 a potential resolution.
  - 5 b. Counsel for the Defendant believes the failure to grant a continuance in this
  - 6 case would deny defense counsel reasonable time necessary for effective
  - 7 preparation, taking into account the exercise of due diligence.
  - 8 c. The Government does not object to the continuance.
  - 9 d. Based on the above-stated findings, the ends of justice served by granting the
  - 10 requested continuance outweigh the best interests of the public and the
  - 11 defendants in a speedy trial within the original date prescribed by the Speedy
  - 12 Trial Act.
  - 13 e. For the purpose of computing time under the Speedy Trial Act, 18 United
  - 14 States Code Section 3161(h)(7)(A) within which trial must commence, the
  - 15 time period of December 15, 2025, and February 23, 2026, inclusive, is
  - 16 deemed excludable pursuant to 18 United States Code Section 3161(h)(7)(A)
  - 17 and (B)(iv), corresponding to Local Code T-4 because it results from a
  - 18 continuance granted by the Court at defendant's request on the basis of the
  - 19 Court's finding that the ends of justice served by taking such action outweigh
  - 20 the best interest of the public and the defendant in a speedy trial.
- 21 3. Nothing in this stipulation and order shall preclude a finding that other provisions
- 22 of the Speedy Trial Act dictate that additional time periods are excludable from
- 23 the period within which a trial must commence.

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27 **IT IS SO STIPULATED.**

1 DATED: December 3, 2025

Eric Grant  
United States Attorney

2  
3 /s/ Caily Nelson  
CAILY NELSON  
Assistant U.S. Attorney

4 DATE: December 3, 2025

5 /s/ Dina Santos  
DINA SANTOS  
Attorney for Antonio Tolentino

6 DATE: December 3, 2025

7 /s/ Timothy Warriner  
TIMOTHY WARRINER  
Attorney for Lucila Calderon

8 **ORDER**


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10 The Court has read and considered the Stipulation Regarding Excludable Time  
11 Period Pursuant to Speedy Trial Act, filed by the parties in this matter. The Court hereby  
12 finds that the Stipulation, which this Court incorporates by reference into this Order,  
13 demonstrates facts that provide good cause for a finding of excludable time pursuant to  
14 the Speedy Trial Act, 18 U.S.C. § 3161.

15 The Court further finds that: (i) the ends of justice served by the continuance  
16 outweigh the best interest of the public and defendant in a speedy trial; and (ii) failure to  
17 grant the continuance would deny defense counsel the reasonable time necessary for  
18 effective preparation, taking into account the exercise of due diligence.

19 Nothing in this Order shall preclude a finding that other provisions of the Speedy  
20 Trial Act dictate that additional time periods are excluded from the period within which  
21 trial must commence.

22 **IT IS SO ORDERED.**

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24 Dated: December 4, 2025

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26 WILLIAM B. SHUBB  
27 UNITED STATES DISTRICT JUDGE  
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